EXHIBIT E

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN, Plaintiff, vs. THIERRY GUETTA a/k/a MR. BRAINWASH; and DOES 1 through 10, inclusive, Defendants.	Case No. CV10-0014-DDP (JCx)

VIDEOTAPED DEPOSITION OF

THIERRY GUETTA

Monday, November 15, 2010

Reported by: Irene Nakamura,

C.S.R. No. 9478, RPR, CLR

IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN, Plaintiff, vs. THIERRY GUETTA a/k/a MR. BRAINWASH; and DOES 1 through 10, inclusive, Defendants.	Case No. CV10-0014-DDP (JCx)

Videotaped Deposition of THIERRY GUETTA, taken on behalf of Plaintiff, at 9401 Wilshire Boulevard, Suite 575, Los Angeles, California, commencing at 10:21 a.m., Monday, November 15, 2010, before Irene Nakamura, Certified Shorthand Reporter for the State of California No. 9478, RPR, CLR, Nevada CSR No. 893, Washington CSR No. 3177.

APPEARANCES:

For Plaintiff:

THE LINDE LAW FIRM
BY: DOUGLAS A. LINDE, ESQ.
9000 Sunset Boulevard
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Los Angeles, California 90069
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For Defendants:

LAW OFFICES OF ALAN GUTMAN
BY: ALAN S. GUTMAN, ESQ.
9401 Wilshire Boulevard
Suite 575
Beverly Hills, California 90212

Also Present:

David Kim, Videographer

12:37:15 I'm going to mark that as Exhibit 12. Let's see
10:13:09 here.
10:13:10 (Whereupon, Plaintiff's Exhibit No. 12 was marked for identification by the deposition officer and is attached
12:37:18 hereto.)
12:37:25 THE DEPONENT: Okay.
12:37:26 MR. LINDE: Take a look at that.
12:37:29 THE DEPONENT: Okay.
(Document placed before the deponent.)
12:37:41 (Deponent reviewed document.)
12:37:41 THE DEPONENT: Boom, boom, boom.
12:37:47 (Humming.)
12:37:47 Yes.
12:37:48 BY MR. LINDE:
12:37:48 Q. Okay. And you recognize pages 2 and 3 of
12:37:57 that exhibit as the Run DMC records work on display
12:38:02 at your Los Angeles -- Los Angeles show?
12:38:04 A. Yes, I do.
12:38:06 Q. Okay. And at some point in time, was
12:38:08 there a "No Smoking" sign that was put on that
12:38:12 Run DMC records?
12:38:13 A. I just don't recall, you know. I mean,
12:38:17 that's may be these photos. I see on the first
12:38:20 photos, they were not -- some not smoking. The

12:39:51 Exhibit 13.

12:39:55 (Whereupon, Plaintiff's Exhibit No. 13 was marked for identification by the deposition officer and is attached

12:40:02 hereto.)

12:40:02 THE DEPONENT: 13. This is this?

12:40:08 BY MR. LINDE:

12:40:08 Q. Correct. This is another copy of it.

12:40:10 A. Okay. Okay.

12:40:19 Q. Do you recognize that?

12:40:20 A. Yes, I do.

12:40:20 Q. And that's a work that you had -- a work

12:40:24 of Run DMC behind -- can we call it fluorescent

12:40:30 graffiti, that you had on display at your show?

12:40:34 A. Yes.

12:40:34 Q. And if we call that one the Run DMC

12:40:40 fluorescent graffiti, is that a -- a fair term to

12:40:42 call it?

12:40:42 A. Sure.

12:40:43 Q. And that was on display at the Los Angeles

12:40:45 show?

12:40:45 A. Yes.

12:40:46 And each one of these painting that you

12:40:48 show me, each one of them is different. This is a

12:40:50 stencil. The one previously was a painting. And

12:46:49 placed on top?
12:46:50 A. Yes. You know.
12:46:54 Q. There was also a copy of the Run DMC Old
12:47:27 Family that was on display at your Los Angeles
12:47:29 show; correct?
12:47:30 A. Yes.
12:47:30 Q. And it was in a picture frame; correct?
12:47:32 A. Yes.
12:47:32 Q. Do you know where that is?
12:47:34 A. I think I have -- I don't recall where it
12:47:44 went, you know. Because it was like -- I don't
12:47:49 recall.
12:47:49 Q. What have you done to try to find that?
12:47:51 A. I look everywhere. I didn't find it.
12:47:53 Q. Have you asked anybody?
12:47:54 A. I guess some -- some people, you know,
12:48:01 took care of it and looked for everything. Even
12:48:03 this painting that I didn't remember show up, and
12:48:06 some print that I don't even know that they were
12:48:10 still here came out. You know, it's -- it's not my
12:48:13 job. That's not what I do.
12:48:15 Q. Whose job is it?
12:48:16 A. It's -- it's...
12:48:16 MR. GUTMAN: To do what, specifically?
12:48:18 Are you talking about to look for the painting?

13:06:12 THE DEPONENT: I don't understand.
13:06:14 BY MR. LINDE:
13:06:14 Q. Sure.
A. So --
13:06:14 Q. You had, by my count, four Run DMC items
13:06:20 at the Los Angeles show; correct?
13:06:21 A. (No audible response by the deponent.)
13:06:25 Q. At least?
13:06:26 A. At least maybe three to four, yeah, I
13:06:29 would say.
13:06:29 Q. Okay. And all of the items -- all of the
13:06:32 Run DMC items that you had on display at your
13:06:35 Los Angeles show incorporated the Glen Friedman
13:06:38 Run DMC photo; correct?
13:06:39 MR. GUTMAN: Objection; asked and
13:06:41 answered.
13:06:41 THE DEPONENT: Umm --
13:06:42 MR. GUTMAN: It's the same photos we've
13:06:43 been talking about, the same images --
13:06:45 THE DEPONENT: I didn't have a -- a
13:06:48 personal photo of Glen Friedman somewhere. It was
13:06:53 something that I recreated. There is no photo of
13:06:56 Glen Friedman there. It's -- it's something that I
13:07:00 create as a freedom of trying to do something
13:07:05 artistic, you know, on a different kind --

13:08:14 well, any -- any of the artwork that had the
13:08:16 Run DMC image or any part of Run DMC image, was it
13:08:20 offered for sale to the public, the works that were
13:08:22 showed at the L.A. show?
13:08:24 THE DEPONENT: I don't recall if they
13:08:25 were. But I know that the print was and the -- the
13:08:30 original like the Records and everything, it's --
13:08:32 it wasn't -- it wasn't any price of it.
13:08:35 BY MR. LINDE:
13:08:35 Q. Okay.
13:08:35 A. I'm not sure of it.
13:08:36 Q. Exhibit 12 is the Records. Do you see
13:08:38 that?
13:08:38 A. Which one? This one? Uh-huh.
13:08:40 Q. And that was on display at the Los Angeles
13:08:43 show; correct?
13:08:43 A. Yes.
13:08:43 Q. And if somebody came to the Los Angeles
13:08:46 show and they wanted to buy it from you, was that
13:08:48 for sale?
13:08:48 A. I don't recall if it was.
13:08:51 Q. Would have you sold it?
13:08:53 A. I didn't sell it.
13:08:54 Q. Would you have sold it if you were offered
13:08:56 money -- enough money for it?

13:10:45 THE DEPONENT: Okay.
13:10:45 MR. GUTMAN: Stick to the question, just
13:10:47 give him a response.
13:10:48 THE DEPONENT: It's not -- it's not just
13:10:49 about Run DMC. You know, you are talking about
13:10:52 Run DMC, Run DMC, Run DMC. There is an artist
13:10:55 behind, you know. I am an artist. This is a piece
13:10:59 of art. It's not a Run DMC. If they wanted
13:11:02 something Run DMC, they go to buy it, any posters
13:11:07 or any photos of -- they came here to see me. Not
13:11:11 Run DMC.
13:11:12 You know, it's part of the -- a movement.
13:11:14 It's part of a freedom of expression, a freedom
13:11:19 of -- of being an artist, of doing something. And
13:11:23 it's like having a statement in Los Angeles, if you
13:11:27 look of the show that I made. It's not words about
13:11:31 money. It's about to make a -- a -- a statement of
13:11:36 the world, of Los Angeles, about a show.
13:11:40 And like if you look at the money that I
13:11:42 made and the money that I spent at the time, you
13:11:48 can look at it, and you'll see that I was not so
13:11:51 much a winner of it. But --
13:11:53 MR. GUTMAN: You got to --
THE DEPONENT: Okay.
13:11:54 MR. GUTMAN: -- stick to the question.

13:15:02 BY MR. LINDE:
13:15:03 Q. Why do you do it?
13:15:03 A. Because I like -- because -- why do I do
13:15:06 it? Because I feel like it, you know. Like --
13:15:08 like sometime I do it, sometime I don't do it. It
13:15:12 doesn't -- it doesn't mean it's because of the
13:15:13 record or of somebody's name that I'm going to do
13:15:17 it, you know. The artwork is behind it. You know.
13:15:21 Q. Now, you made a series --
13:15:24 A. If I wanted to sell records, I would sell
13:15:27 records. This is art, not records.
13:15:30 Q. You made a series of postcards that you
13:15:34 used to advertise your Los Angeles show; correct?
13:15:36 A. Yes, I did.
13:15:38 Q. Okay. Did you select the images to be
13:15:45 featured on the postcards?
13:15:46 A. Yes, I did.
13:15:46 Q. You personally selected each one of them?
13:15:49 A. Yes, I did.
13:15:49 Q. Do you know how many different postcards
13:15:52 were made?
13:15:52 A. I -- I don't recall.
13:15:55 Q. Approximately?
13:15:56 A. 30, 40.
13:15:59 Q. Do you have a complete listing of all of